

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
DOUGLAS P. RUSZCYK AND : CHAPTER 7
CYNTHIA L. RUSZCYK :
: CASE NO. 5-23-00311

JILL E. DURKIN :
CHAPTER 7 TRUSTEE :
Movant, :
vs. :
DOUGLAS P. RUSZCYK AND :
CYNTHIA L. RUSZCYK :
Respondent. :

DEBTOR'S ANSWER TO CHAPTER 13 TRUSTEE'S
OBJECTION TO CLAIM OF EXEMPTION

AND NOW Comes, Douglas and Cynthia Ruszcyk, the Debtor, and files an Answer to
Chapter 7 Trustee's Objection to claim of Exemption and states the following:

1. The exemption of assets claimed under 11 U.S.C. SECTION 522(d)(2) and 11
U.S.C. SECTION 522(d)(5) are proper as the Debtor's never requested or transferred the title to
the 2019 Chevrolets Silverado out of their name. Under Section 522(d)(2), Debtors are allowed
to take an exemption for a vehicle which they have ownership.

2. Debtors have properly exempted the above vehicle under 11 U.S.C. SECTION
522(d)(2) and 11 U.S.C. SECTION 522(d)(5).

4. There is no reasonable basis for Trustee's objection to exemptions rightfully
taken by the Debtor pursuant to 11 U.S.C. SECTION 522(d)(2) and 11 U.S.C. SECTION
522(d)(5) .

5. There is no basis under the law to deny Debtor's exemptions.

WHEREFORE, the Debtor respectfully requests that this Court Overrule Chapter 7
Trustee's Objection to Claim of Exemption.

Respectfully submitted,

Date: March 18, 2025

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
381 N. 9th Avenue
Scranton, PA 18504
(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 18, 2025, he caused a true and correct
copy of Debtor's Answer to Chapter 7 Trustee's Objection to claim of Exemption to be served
Via electronic filing on the following CM/ECF users at the following address:

Jill E. Durkin, Esq. at jilldurkinesq@gmail.com

Dated: March 18, 2025

/s/Tullio DeLuca
Tullio DeLuca, Esquire